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February 4, 2023


By ECF

Honorable Ronnie Abrams
U.S. District Judge
Southern District of New York
40 Foley Square
New York, N.Y. 10007

Application granted.

SO ORDERED.

Re: United States v. Angela Rodriguez
20 Cr. 39 (RA)



Ronnie Abrams, U.S.D.J.
February 6, 2023

Dear Judge Abrams,

Bail in this matter was set by Magistrate Judge Katharine H. Parker on November 14, 2019. Among other conditions of her bail, Ms. Rodriguez's travel is limited to the Southern and Eastern Districts of New York. As the Court may recall, on September 6, 2022, Ms. Rodriguez successfully graduated from the Young Adult Opportunity Program. Currently we are in discussions with the Government regarding a resolution to this matter. In the meantime, Ms. Rodriguez has been going to school, taking care of her daughter, and growing her cake business. Ms. Rodriguez writes now respectfully seeking permission from the Court to take a short trip with her daughter to Cancun, Mexico from February 14, 2023 to February 17, 2023.¹

Should the Court grant this request, the defense respectfully requests that Ms. Rodriguez be allowed to retrieve her passport from Pretrial Services before she leaves, with the understanding that she will return the passport to Pretrial Services immediately upon her return.

Defense counsel has spoken to AUSA Samuel Rothchild and Pretrial Services Officer Dayshawn Bostic, both of whom take no position regarding this request and defer to the judgment of the Court.

Thank you.

¹ Should the Court approve this request, more specific hotel and flight information will be provided to Pretrial Services. Also, because Ms. Rodriguez's flight leaves from Newark Airport, the defense seeks permission for Ms. Rodriguez to travel to the District of New Jersey as well.

Respectfully submitted,

/s/ Matthew J. Kluger

Matthew J. Kluger, Esq.

Attorney for Angela Rodriguez

cc: AUSA Samuel P. Rothschild
PTSO Dayshawn Bostic